

EXHIBIT 1

AO 88D (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

EASTERN DISTRICT OF NEW YORK

Walter Chow, as Administrator of Leroy Chow's

Plaintiff

Shorefront Operating LLC d/b/a Seagate
Rehabilitation and Nursing Center, et al.,

Defendant

Civil Action No. 19-cv-03541-FB-JRC

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

ELIZABETH HALIFAX

To:

(Name of person to whom this subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment "A".

Place: Wilson Elser Moskowitz Edelman & Dicker, LLP 655
Montgomery Street Suite 900 San Francisco, CA 94111

Date and Time:

07/10/2022 2:46 pm

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

/s/ Robert J. Cristiano

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Shorefront Operating LLC, d/b/a Seagate Rehabilitation and Nursing Center, et al., who issues or requests this subpoena, are:
Robert J. Cristiano Wilson Elser 1133 Westchester Avenue White Plains New York 10604 (516) 872-7458
robert.cristiano@wilsonelser.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ATTACHMENT A
CIVIL CASE SUBPOENA – ELIZABETH HALIFAX
PRODUCTION OF DOCUMENTS

1. All facility files retained by Ms. Halifax from any skilled nursing homes at which Ms. Halifax worked, was employed, or for which she provided any consultation or other services, or that were the subject of any, or referred to in, reports, studies, consultations, or testimony authored or provided by Ms. Halifax.
2. All documents that reflect or identify the nursing staff hppd (hours per patient day), hprd (hours per resident day), and/or nursing to patient ratios of any skilled nursing homes at which Ms. Halifax worked, was employed, or for which he provided any consultation or other services, or that were the subject of any, or referred to in, reports, studies, consultations, or testimony authored or provided by Ms. Halifax..
2. Any and all spreadsheets, worksheets, notes, or other work product created or considered by Ms. Halifax in connection with the preparation and drafting of the her April 13, 2022 report and Rule 26(a) disclosures in this case.
3. Ms. Halifax's entire file regarding *Chow v. SentosaCare LLC, et al.*, 1:19-cv-03451-FB-JRC(E.D.N.Y.).
4. Ms. Halifax's entire file regarding *Lori DeAnda v. United Medical Investors Limited Partnership*., Cause No. 1816-CV24962 (Circuit Court Jackson County, Missouri)
5. Ms. Halifax's entire file regarding *Corbie Crow et al. v. Stratford Commons Rehabilitation and Healthcare Center LLC*, No. 20CV00369,(District Court of Johnson County Kansas, No. 20CV00369).

6. Copies of any and all written or electronic communication with Ernest Tosh regarding *Chow v. SentosaCare LLC, et al.*, 1:19-cv-03451-FB-JRC (E.D.N.Y.).
7. Any and all data, documents, electronic sources, spreadsheets, worksheets, notes, concerning "CMS Case-Mix hours" considered by Ms. Halifax in connection with the preparation and drafting of the her April 13, 2022 report and Rule 26(a) disclosures in this case.